

GOLDMAN & BESLOW, LLC  
7 Glenwood Avenue, Ste. 311B  
East Orange, New Jersey 07017  
Tel. 973-677-9000  
Mark Goldman, Esq. #MG-8019  
David G. Beslow, Esq. #DGB-5300  
Attorneys for Debtor(s)

In Re:

KOLLETTE LYNN TAYLOR

Debtor (s)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

CASE NO: 18-30573/CMG

CERTIFICATION OF SERVICES

FROM: 02/24/14

TO: 06/18/19

DATE MATTER HEARD:

MARK GOLDMAN, ESQ. & DAVID G BESLOW, hereby certifies that:

1. I am the attorney representing the debtor(s) in this matter.
2. **Narrative Summary of Case:** This Chapter 13 case was filed to stop a foreclosure action and to address tax obligations. Multiple strategic consultations were accordingly held with the Debtor to prepare for the signing of the petition, schedules and plan. All documents were prepared by counsel in a timely fashion and filed with the Court. There was substantially more work done on this case than normal because the Debtor hired our firm in 2014 and over the course of time her circumstances changed multiple times and required additional reviews and substantially more work on the file than usual. There were additional complexities involving a previous 2011 bankruptcy filing handled by different counsel, and issues involving debts owed to the State of New York Division of Taxation. After this most recent case was filed, there were issues relating to estimated tax claims that took substantial amounts of time to resolve because of a dispute as to what years of returns had actually been filed by the Debtor. These issues have now been resolved and the Debtor is ready to move forward with confirmation. The Debtor has proposed and is ready to confirm a case that will cure what is owed to the mortgage company in full over the life of her case, while catching up with what is owed to the tax authorities. The Debtor is cramming down secured tax debt while paying off any priority obligations in full. The Debtor is also cramming down a car loan to the value of the vehicle. The Debtor has benefited substantially by the work in this case as the filing created an automatic stay, stopping the foreclosure, and has allowed her to catch up with all her debts. The Debtor is voiding liens against her property, and is catching up with tax obligations. The creditors have benefited substantially from this case as they would receive more money than had the Debtor filed a Chapter 7 case.
3. The attorneys and/or paralegals employed on this matter are/were: Mark Goldman, Esq., David G. Beslow, Esq., Clifford B. Frish, Virginia Jackson, Yamis Rodriguez and Melanie Emmanuele, they are identified respectively in the following

4. Time has been recorded in increments of 1/10<sup>th</sup> of an hour as set forth below. In sum, the following amounts of time have been spent on behalf of the debtor(s) in reference to this matter on the dates specified:

Date(s)		MG/DB	ASSOC.	PL
<b>OFFICE CONSULTATIONS</b>				
02/24/14	Initial consultation with client	n/c		
03/11/14 03/13/14	Complete and review worksheets with client		CF 1.0	
	Preparation and filing of application for extension of time to file plan with certificate of service			
04/30/15	Consultation with client	MG 1.0		
07/26/16	Consultation with client	MG .7		
	Consultation with client			
	Consultation with client			
<b>REVIEW SCHEDULES, PETITION AND PLAN</b>				
04/18/14 10/02/18	Review and execute schedules and plan; preparation of second draft of schedules and plan	MG 1.0 MG 1.5		
10/15/18	Preparation and filing of petition and review worksheets	MG 2.3		
	Preparation of income contribution Certification			
	Final attorney review of completed schedules and plan			
<b>REVISION AND/OR MODIFICATION OF PLAN AND/OR SCHEDULES</b>				
04/16/19 03/04/19	Prepare and file second modified chapter 13 plan; prepare and file amended schedule I & J and service	MG 1.2		ME .5
06/22/19	Prepare and file third modified plan and service	MG .5		ME .5
<b>COURT APPEARANCE/FILE REVIEW</b>				
11/29/18	341 Hearing pre & post 341 file review and paralegal preparation; appearance by	MG .3		VJ .3

	outside counsel	Document Page 3 of 9			
	Adjourned Hearing				
03/18/19 04/12/19 06/30/19	Pre-Confirmation file review	MG .5			
04/17/19 03/06/19 07/03/19 06/05/19	Attendance at Confirmation hearing appearance by outside counsel				
11/30/18	File Review	MG .3			
<b>DOCUMENT REVIEW</b>					
	Mortgagee proof of claim –				
	Mortgagee proof of claim-				
12/17/18 11/01/18 04/16/18 06/18/18	Proof of Claim – IRS; submit returns 2013, 2016, & 2017 phone call to IRS	MG .2			VJ .3
01/16/19 04/16/19 04/17/19 04/09/19 06/18/18	Proof of Claim – review amended NJ proof of claim; submit W-2's to NJ and returns; phone call from State	MG .2			YR 1.0
(E)	Proof of Claim – review amended proof of claim NJ and IRS from mortgagee	MG .3			
10/31/18	Request from IRS	MG .2			
05/03/16	Review Interim Order regarding confirmation	MG .2			
(E)	Review Trustee proposed distribution	MG .2			
(E)	Review Confirmation Order	MG .1			
05/30/19 05/11/19 03/26/19 04/11/19 02/27/19 06/17/19 03/04/19 01/07/19	Review Mortgagee objection to confirmation	MG .7			
10/19/18	Review auto lender objection capital one and resolution	MG .3			
(E)	Review Trustee Annual Reports	MG .2			
(E)	Review Notice of Mortgage Payment	MG .2			
	Review Trustee objection to confirmation				

Document Page 4 of 9				
TELECONFERENCES REVIEW OF FAXES AND/OR CORRESPONDENCE FROM CLIENT				
05/13/14 04/25/14 03/07/14	Phone call to client	MG .2		VJ .3
11/20/18 12/09/18 07/18/16 06/29/16	Phone call from client; left message for client	MG .9		VJ .2
07/20/16	Phone call to client	MG .2		
03/07/14 04/17/19 05/31/19	Return call to client Phone call to client	MG .2		VJ .3
09/27/18 09/06/18 06/30/16 04/20/15	Phone call from client Phone call from client Phone call to client	MG .5		VJ .2
10/11/18 11/20/18 10/17/18	Phone call from client Phone call to client Phone call from client	MG .2		ME .3
CORRESPONDENCE TO CLIENT				
	File opening letter/Opening of file			
	Advising of Status – 15 day letter			
	To schedule appointment to execute schedules and plan			
10/17/18	Chapter 13 instructional letter	MG .2		
	Regarding 341 hearing			
05/31/19 12/20/19 03/08/19	Regarding confirmation hearing and deficiencies	MG .7		
	Outcome to Confirmation w/order(2)	MG .2		
10/17/18	Debtor education course requirement	MG .2		
CREDITOR/TRUSTEE CORRESPONDENCE				
	Letter to creditor advising of filing and to cease and cancel all collection activities.			
	Letter to Sheriff and Mortgagee to cancel Sheriff's sale (fax, mail and call)			
04/16/19	Preparation and submission of Certification of Compliance Sec. 1325 (a)(8)	MG .1		VJ .2

CREDITOR INQUIRIES				
LOSS MITIGATION				
	Prepare and file request for loss mitigation; services upon parties			
	Service of loss mitigation order			
MISCELLANEOUS				
	Register for credit counseling			
	Order and Review IRS Transcripts			
10/26/18 10/19/18 04/06/19	Scan & redact documents including tax returns and email tax returns to trustee and appraisal; check Trustee website			ME .5
(E)	Prepare & file Pre-discharge Certification & completion of Debtor Education Certification	MG .2		VJ .6
04/14/14	Phone call to IRS			ME .3
12/27/18	Adjournment request to resolve Trustee objection			YR .2
	Monitor Sheriff's sale\45 day-requirement			
10/26/18	Order & review judgment/mortgage search	MG .2		ME .2
05/30/19 05/31/19	Preparation of fee application, affidavit of service, file and claim review	MG 1.0		YR .3
	Review internet payment history			
	Review PACER/prior filing			
06/03/19 04/17/19	Diary deadline date/monitor 45 day requirement and review docket text			YR .2
03/03/14 10/15/18	Order and review credit report	MG .3		ME .3
MOTION TO VACATE STAY				
	Receipt and review motion to vacate stay			
	Letter to client regarding motion			
	Attempts to resolve\discussions with			

	adversary Document Page 6 of 9			
	Review and Submit Order			
	Court Appearance			
	Discussions w/client			
	Disposition letter			
<b>TRUSTEE MOTION TO DISMISS</b>				
	Receipt and review motion to dismiss			
	Letter to client			
	Court appearance			
<b>CREDITOR MOTIONS</b>				
	Receipt and review			
	Letter to client			
	Court appearance			
	Attempts to resolve			
	Review Order			
	Response to motion\research			
<b>DEBTOR(S) MOTIONS</b>				
04/17/19 03/05/19 10/17/18	Preparation and filing of stripoff motion via Court rule; certificate of service – IRS, judgment & lien creditors	MG .3		YR 1.0 ME .8
	Court appearance			
	Service of motion and order			
	Preparation and filing of motion objecting to claim			
	Service of motion and order			
	Review response of mortgagee			
	Court appearance(s)			

	Preparation and filing of motion to			
	Service of motion and order			
	Court appearance(s)			
	Letter to client re: motion			
	Review motion prior to Court			

Total Time Spent (MG)(DB) 1062

1062 Divided by 60 minutes equals

17.70 Hours time \$400.00 per hour = \$ 7,080.00

Total Time Spent (Assoc) 60

60 Divided by 60 minutes equals

1.0 Hours time \$375.00 per hour = \$ 375.00

Total Time Spent (PL) 510

510 Divided by 60 minutes equals

8.50 Hours time \$175.00 per hour = \$ 1,487.50

Subtotal . . . . \$ 8,942.50

Costs

Filing Fee . . . . . \$ 310.00

Credit Reports \$ 35.00

Other: Pacer, Copy & Postage Other \$ 133.85

Entry into loss mitigation \$           

Judgment search/mortgage searches \$ 51.00

Outside counsel (4 appearances) \$ 200.00

Deed search \$           

Subtotal \$ 729.85

TOTAL AMOUNT DUE \$ 9,672.35

\*GOOD WILL REDUCTION \$ 291.75

\$ 9,380.60

(E) Denotes Estimated  
(MG) Mark Goldman, Esq.  
(DB) David G. Beslow, Esq.  
(ASSO) Associate  
(PL) Paralegal



I hereby certify that the foregoing statements made by me are true. I am aware that if

any of the foregoing statements made by me are willfully false, I am subject to punishment for false swearing.

  
\_\_\_\_\_  
MARK GOLDMAN, ESQ.  
\_\_\_\_\_  
DAVID G. BESLOW, ESQ.